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June 24, 2019

**Via Email**

Honorable Lois H. Goodman  
United States District Court  
District of New Jersey  
Clarkson S. Fisher Building & U.S. Courthouse  
402 East State Street Room 2020  
Trenton, NJ 08608

*Extension granted for  
additional 30 days  
to September 5, 2019.*

So Ordered this 28<sup>th</sup> day  
of JUNE, 2019

Re: ***John Doe v. The Trustees of Princeton University, et al.***  
***Civil Action No. 3:19-cv-12577-BRM-LHG***

Dear Judge Goodman:

Defendants The Trustees of Princeton University ("Princeton"), Michelle Minter ("Minter"), Regan Hunt Crotty ("Crotty"), Joyce Chen Shueh ("Shueh"), and Edward White ("White") (collectively, "the individual defendants" and collectively with Princeton, "the Princeton Defendants"), respectfully request that the Court grant a modest extension of time for the Princeton Defendants to answer or otherwise respond to Plaintiff's Complaint up to and including October 7, 2019. In support of this request, the Princeton Defendants state as follows:

1. Plaintiff filed his Complaint (the "Complaint") in the above-captioned lawsuit on May 16, 2019. The Complaint is lengthy and broad, asserting 12 causes of actions based on allegations constituting more than 122 pages and 557 paragraphs.
2. Plaintiff has not yet served the Princeton Defendants. Plaintiff issued waivers of service on June 7, 2019, which the Princeton Defendants intend to sign so as to alleviate Plaintiff's burden of service. The initial period of time for Defendants to answer or otherwise respond to Plaintiff's Complaint pursuant to the waivers of service currently would expire no earlier than August 6, 2019.
3. The Princeton Defendants have not requested or obtained any other extensions of time to respond to Plaintiff's Complaint in this matter.
4. Plaintiff's counsel has filed multiple similar actions against the Princeton Defendants on behalf of different plaintiffs, containing similarly lengthy and broad allegations but arising from different facts and raising different issues and theories. Indeed, Plaintiff's counsel filed the current action while briefing is ongoing on the Princeton Defendants'

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motion to dismiss by undersigned counsel in another such action.<sup>1</sup> Briefing on that motion is scheduled to complete on September 9, 2019.

5. Given the length and breadth of the Complaints and the numerous facts and issues asserted, the Princeton Defendants fairly need additional time to respond fully and appropriately. The Princeton Defendants seek a short extension to permit the completion of briefing on the first Complaint Plaintiff's counsel filed against the Princeton Defendants before responding to the instant Complaint.
6. Counsel for the Princeton Defendants has conferred with Plaintiff's counsel on June 13 and June 21, 2019, and Plaintiff's counsel has informed the Princeton Defendants that Plaintiff opposes this request.
7. The Princeton Defendants respectfully request an extension of time to October 7, 2019 to respond to Plaintiff's Complaint. The requested extension is made in the interest of justice, and efficient use of the parties' and the Court's resources, and is not made with the intent to delay.

For these reasons, the Princeton Defendants respectfully request that their time for filing and serving an answer, motion, or other response to the Complaint be extended up to and including October 7, 2019.

Respectfully submitted,

/s/ Linda Wong

Linda Wong, Esq.

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<sup>1</sup> That lawsuit, styled *Doe v. Princeton University, et al*, No. 3:19-cv-07853-BRM-TJB, is assigned to District Judge Martinotti and Magistrate Judge Bongiovanni.



*Counsel for Defendants The Trustees of  
Princeton University, a not-for-profit  
education corp. of the State of New Jersey,  
Michele Minter, Regan Hunt Crotty, Joyce  
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Enclosure  
LW/DP  
File No. 2609.0014